

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. _____
)	Count One: MITCHELL and BROWN
MORRIS L. MITCHELL,)	18 U.S.C. § 371
[DOB: XX/XX/1959],)	[NMT: Five Years; \$250,000 Fine;
)	Three Years Supervised Release]
and)	
)	Count Two: MITCHELL only
RAMAR D. BROWN,)	18 U.S.C. § 2119
[DOB: XX/XX/1974],)	[NMT: Fifteen Years; \$250,000 Fine; Five
)	Years Supervised Release]
Defendants.)	

Counts Three, Five, Fourteen, Eighteen,
Twenty-Two: BROWN only
18 U.S.C. § 1951
[NMT: Twenty Years; \$250,000 Fine;
Five Years Supervised Release]

Counts Four, Six, Eight, Ten, Twelve,
Sixteen, Twenty, Twenty-Six, Twenty-Eight,
Thirty, Thirty-One, Thirty-Three, Thirty-
Five, and Thirty-Seven: MITCHELL and
BROWN
18 U.S.C. §§ 1951 and 2
[NMT: Twenty Years; \$250,000 Fine;
Five Years Supervised Release]

Counts Seven, Nine, Eleven, Thirteen,
Seventeen, Twenty-One, Twenty-Five,
Twenty-Seven, Twenty-Nine, Thirty-Two,
Thirty-Four, Thirty-Six, and Thirty-Eight:
MITCHELL and BROWN
18 U.S.C. §§ 924(c)(1)(A)(ii) and 2
[NLT: Seven Years Imprisonment or
Twenty-Five Years for a Second Conviction
or Life Imprisonment for a Third
Conviction;
NMT: Life Imprisonment; \$250,000 Fine;
Five Years Supervised Release]

Counts Fifteen, Nineteen, and Twenty-Three: BROWN only
18 U.S.C. §§ 924(c)(1)(A)(ii)
[NLT: Seven Years Imprisonment or Twenty-Five Years for a Second Conviction or Life Imprisonment for a Third Conviction;
NMT: Life Imprisonment; \$250,000 Fine; Five Years Supervised Release]

Count Twenty-Four: MITCHELL and BROWN
18 U.S.C. §§ 2119 and 2
[NMT: Fifteen Years; \$250,000 Fine; Five Years Supervised Release]

Count Thirty-Nine: MITCHELL only
18 U.S.C. §§ 922(g)(1) and 924(e)
[NLT: Fifteen Years Imprisonment;
NMT: Life Imprisonment; \$250,000 Fine; Five Years Supervised Release]

Count Forty: BROWN only
18 U.S.C. §§ 922(g)(1) and 924(a)(2)
[NMT: Ten Years Imprisonment; \$250,000 Fine; Three Years Supervised Release]

\$100 Mandatory Special Assessment for Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From on or about November, 2005, and continuing thereafter up to and including December 15, 2005, in the Western District of Missouri and elsewhere, MORRIS L. MITCHELL and RAMAR D. BROWN, did knowingly conspire, combine, confederate and agree with each other, to interfere with commerce by armed robbery and carjacking, in violation of Title 18, United States Code, Sections 1951 and 2119, and to violate the federal firearms laws, specifically Title 18, United States Code, Sections 924(c), and 922(g)(1).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that MORRIS L. MITCHELL and RAMAR D. BROWN, would commit robberies of businesses in the Kansas City, Missouri metropolitan area. Defendants MORRIS L. MITCHELL and RAMAR D. BROWN would steal or carjack a motor vehicle to use in the robberies. One or both defendants would enter the business and make a demand for money. During this demand for money, one or both defendants brandished a firearm or used another weapon to threaten the clerk to obtain money. One or both defendants would then grab United States currency from the cash register, or remove the entire cash tray or cash register from the business. In many of the robberies, one defendant would act as a look-out and getaway driver for the other.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the goals of the conspiracy, the following overt acts, among others, were committed by the defendants in the Western District of Missouri and elsewhere.

1. On or about November 23, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, attempted to rob Subway, 3214 Main Street, Kansas City, Missouri. RAMAR D. BROWN entered the business, grabbed the clerk by the collar of her shirt, and pointed a black handgun at her demanding, "Give me the money!" The clerk fell to the ground screaming, and RAMAR D. BROWN unsuccessfully attempted to open the cash register on his own. RAMAR D. BROWN then fled the business and got into a vehicle driven by MORRIS L. MITCHELL.

2. On or about November 24, 2005, RAMAR D. BROWN, using and displaying a weapon, robbed Naughty But Nice, 8910 East 40 Highway, Kansas City, Missouri. RAMAR D. BROWN entered the business and asked the clerk for a product behind the counter. When the clerk turned around, RAMAR D. BROWN pulled out a can of pepper spray and sprayed the clerk in the face. RAMAR D. BROWN then attempted to open the cash register, and when he could not get it to open, he picked up the entire cash register and fled the business with it.

3. On or about November 24, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Millenium Super Stop, 1603 West 12th Street, Kansas City, Missouri. MORRIS L. MITCHELL and RAMAR D. BROWN entered the business. RAMAR D. BROWN pulled out a handgun and told the clerk, "Open the register." MORRIS L. MITCHELL grabbed the cash drawer from one register, while RAMAR D. BROWN grabbed the cash drawer from another cash register, and they fled the business.

4. On or about December 6, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, stole a motor vehicle, a 1992 gold Chevrolet Lumina, bearing Missouri License Tag No. XXXX, VIN No. XXXX, from a residence located at XXXX, Kansas City, Missouri.

5. On or about December 6, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Berbiglia, 3120 Gillham Plaza, Kansas City, Missouri. MORRIS L. MITCHELL entered the business and pointed a black handgun at the cashier, and told her, “Don’t make a move. Just back away from the drawer.” MORRIS L. MITCHELL then reached in the drawer and grabbed United States currency and fled the business in the stolen gold Chevrolet Lumina, described in Overt Act 4, that was being driven by RAMAR D. BROWN.

6. On or about December 7, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, attempted to rob Walgreens, 2501 Linwood Boulevard, Kansas City, Missouri. MORRIS L. MITCHELL entered the store, pulled a black handgun, and pointed it at the clerk. When the clerk ran into a back office and locked the door, MORRIS L. MITCHELL fled the business and got into the stolen gold Chevrolet Lumina, described in Overt Act 4, that was being driven by RAMAR D. BROWN.

7. On or about December 7, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Walgreens, 4630 Troost Avenue, Kansas City, Missouri. MORRIS L. MITCHELL entered the store, pulled a black handgun, and pointed it at the clerk. MORRIS L. MITCHELL then took money from the open cash drawer and fled the business. MORRIS L. MITCHELL then entered the stolen gold Chevrolet Lumina, described in Overt Act 4, that was being driven by RAMAR D. BROWN.

8. On or about December 8, 2005, RAMAR D. BROWN, using and displaying a firearm, robbed Shell Gas Station, 1901 Russell Road, Kansas City, Missouri. RAMAR D. BROWN entered the business and pulled out a black handgun. RAMAR D. BROWN told the clerk, “Give me all your money!” RAMAR D. BROWN then stole United States currency and fled the

business. RAMAR D. BROWN was driving the stolen gold Chevrolet Lumina, described in Overt Act 4, during this robbery.

9. On or about December 9, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Family Dollar, 634 Prospect Avenue, Kansas City, Missouri. MORRIS L. MITCHELL and RAMAR D. BROWN entered the business. MORRIS L. MITCHELL pulled out a handgun and pointed it at the cashier, stating, “Don’t play with me or I’ll kill you.” MORRIS L. MITCHELL then grabbed a cash drawer, and he and RAMAR D. BROWN fled the business. MORRIS L. MITCHELL and RAMAR D. BROWN then drove away from the business in the stolen gold Chevrolet Lumina, described in Overt Act 4.

10. On or about December 10, 2005, RAMAR D. BROWN, using and displaying a firearm, robbed Simply Fashions, 3135 Prospect Avenue, Kansas City, Missouri. RAMAR D. BROWN entered the business and showed the clerk a handgun. RAMAR D. BROWN then reached over the counter and removed the cash drawers from two of the cash registers, and fled the business. RAMAR D. BROWN then drove away in the stolen gold Chevrolet Lumina, described in Overt Act 4.

11. On or about December 11, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Osco Drug, 3106 Prospect Avenue, Kansas City, Missouri. MORRIS L. MITCHELL entered the business and approached one of the clerks. MORRIS L. MITCHELL pulled out a black handgun and told the clerk, “Don’t look up. Give me the money.” MORRIS L. MITCHELL then grabbed the cash tray and left the business. MORRIS L. MITCHELL then entered the stolen gold Chevrolet Lumina, described in Overt Act 4, that was driven by RAMAR D. BROWN, and fled the scene.

12. On or about December 12, 2005, RAMAR D. BROWN, using and displaying a firearm, robbed Family Dollar, 3156 Troost Avenue, Kansas City, Missouri. RAMAR D. BROWN entered the business and approached a clerk. RAMAR D. BROWN then pulled out a handgun and said, "Give me the money!" RAMAR D. BROWN grabbed the cash drawer and fled the business in the stolen gold Chevrolet Lumina, described in Overt Act 4.

13. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, stole a motor vehicle, a 2002 blue Chevrolet Monte Carlo, bearing Missouri License Tag No. XXXX, VIN No. XXXX, from Sonya and Mary Heard, at B.P. Gas Station, 4632 Paseo Boulevard, Kansas City, Missouri. Sonya Heard was fueling her vehicle when MORRIS L. MITCHELL and RAMAR D. BROWN approached her. MORRIS L. MITCHELL told Sonya Heard, "I'm taking your car," and pulled out a gun and pointed it at her. RAMAR D. BROWN then approached the passenger side of the vehicle and pulled Mary Heard from the vehicle. RAMAR D. BROWN then took Mary Heard's purse and got into the vehicle. MORRIS L. MITCHELL got into the vehicle and they left the gas station.

14. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Shell Gas Station, 8435 East 63rd Street, Kansas City, Missouri. MORRIS L. MITCHELL entered the business, approached the counter, and pulled out a black handgun. MORRIS L. MITCHELL pointed the handgun at the clerk and stated, "Give it up!" MORRIS L. MITCHELL then stole United States currency from the cash drawer and fled the business. MORRIS L. MITCHELL then entered the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, being driven by RAMAR D. BROWN, and they fled the scene.

15. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Fast Stop, 7100 Eastwood Trafficway, Kansas City, Missouri. MORRIS L. MITCHELL entered the business and approached the clerk. MORRIS L. MITCHELL then pulled out a black handgun and pointed it at the clerk, stating, "Give me the money!" MORRIS L. MITCHELL then reached across the counter, grabbed the cash drawer and fled the business. MORRIS L. MITCHELL then got into the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, being driven by RAMAR D. BROWN, and they left the scene.

16. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, robbed McDonalds, 5220 Bannister Road, Kansas City, Missouri. RAMAR D. BROWN entered the business and approached the counter. RAMAR D. BROWN ordered and paid for food. RAMAR D. BROWN then asked the clerk to take out another bag. RAMAR D. BROWN then told the clerk, "Don't move. Don't turn around. I have a gun in my pocket. Give me all the money in the register!" The clerk then placed United States currency in the second bag, which RAMAR D. BROWN grabbed and fled the business. RAMAR D. BROWN then entered the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, being driven by MORRIS L. MITCHELL, and fled the scene.

17. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Fashion Cents, 3120 Prospect Avenue, Kansas City, Missouri. RAMAR D. BROWN entered the business and walked directly to the counter. When the clerk asked, "Can I help you?" RAMAR D. BROWN replied, "Yeah, you can help me. Give me all your money or I will kill you!" The clerk got the keys and had trouble opening the register. RAMAR D. BROWN told her, "Taking too long . . . get the drawer open, or I will

shoot you!” RAMAR D. BROWN then grabbed United States currency from the drawer and fled the business. RAMAR D. BROWN entered the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, being driven by MORRIS L. MITCHELL, and they fled the scene.

18. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed U-Haul, 1530 Locust Street, Kansas City, Missouri. RAMAR D. BROWN entered the business and approached the counter. RAMAR D. BROWN pulled out a handgun and pointed it at the clerks, and told them, “Give me all the money!” When the clerk had trouble opening the register, RAMAR D. BROWN said, “You have three seconds to give me all the money!” and he began to count. The clerk opened the register and RAMAR D. BROWN grabbed United States currency and fled the business. RAMAR D. BROWN then entered the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, being driven by MORRIS L. MITCHELL, and fled the scene.

19. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Family Dollar, 7500 Prospect Avenue, Kansas City, Missouri. MORRIS L. MITCHELL and RAMAR D. BROWN entered the business. RAMAR D. BROWN approached a security guard and put a handgun to the guard’s back, stating, “I know you got a gun. I ain’t playin’. I’ll blow your [REDACTED] away.” RAMAR D. BROWN then patted the guard down. RAMAR D. BROWN then told the guard to back up, and pointed the handgun at the clerks and told them to open the registers. RAMAR D. BROWN and MORRIS L. MITCHELL then stole United States currency from the registers and fled the business. RAMAR D. BROWN and MORRIS L. MITCHELL got into the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, and fled the scene.

20. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, using and displaying a firearm, robbed Enterprise Car Rental, 600 Grand Boulevard, Kansas City, Missouri. RAMAR D. BROWN and MORRIS L. MITCHELL entered the business. RAMAR D. BROWN asked the clerk about renting a car. The clerk asked for a major credit card. RAMAR D. BROWN said he did not have one, and then pulled out a handgun, pointed it at her, and said, "Can I rent one now?" RAMAR D. BROWN then took the clerk into a back office and stole United States currency from a cash drawer. RAMAR D. BROWN and MORRIS L. MITCHELL then left the business, and entered the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, and fled the scene.

21. On or about December 13, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN, drove, possessed and unlawfully operated the stolen blue Chevrolet Monte Carlo, described in Overt Act 13, and used this vehicle to flee from police in a high speed car chase. Kansas City, Missouri police officers pulled behind the vehicle, activated their emergency equipment, and attempted to initiate a traffic stop. RAMAR D. BROWN pulled the vehicle over after a brief chase and jumped out of the vehicle and fled from the police on foot. MORRIS L. MITCHELL then moved to the driver's seat and took over driving the stolen blue Chevrolet Monte Carlo, and continued to flee from the police in a high speed car chase. During the car chase, MORRIS L. MITCHELL ran red lights, drove the wrong way into on-coming traffic, ran stop signs, and drove the stolen vehicle off of the roadway. The chase ended in Kansas City, Kansas. MORRIS L. MITCHELL drove the stolen vehicle the wrong way down 7th Street in Kansas City, Kansas, and collided with another vehicle, causing serious physical injury to the driver, Debry Harris. The stolen vehicle had a license plate bearing Missouri Tag No. XXXX,

which responded as being stolen from another vehicle. The stolen vehicle also contained numerous items belonging to Mary and Sonya Heard, as well as the original license plate for the vehicle and United States currency.

22. Between on or about October 22, 2005, and on or about December 15, 2005, MORRIS L. MITCHELL and RAMAR D. BROWN used the residence located at XXXX, Kansas City, Missouri, to store the items taken in robberies they committed. The stolen gold Chevrolet Lumina, described in Overt Act 4, was stored in the garage at this residence. This vehicle contained an empty cash drawer, and receipts for "Osco Drug" located at "3106 S. Prospect" that were dated "12-11-05", which corresponds with the location and date of the robbery described in Overt Act 11. Inside the residence, MORRIS L. MITCHELL and RAMAR D. BROWN stored the cash register stolen from Naughty but Nice, described in Overt Act 2. This stolen cash register contained a receipt, which read, "Naughty But Nice" located at "8910 E. 40 HWY" and dated "11-24-05". Detectives also recovered a "Roca Wear" jacket with the number "99" on the left sleeve, which RAMAR D. BROWN is visibly wearing on video surveillance from the Millenium Super Stop robbery described in Overt Act 3.

23. On or about December 15, 2005, RAMAR D. BROWN, with assistance from persons both known and unknown to the Grand Jury, did obtain a razor and other toiletries, which RAMAR D. BROWN used to shave his face and head, which substantially altered his appearance prior to his arrest by members of the Kansas City, Missouri Police Department.

24. On or about December 15, 2005, RAMAR D. BROWN, resisted arrest by Kansas City police officers when the officers contacted him at the Motel 6, located at 6400 East 87th Street, Kansas City, Missouri. RAMAR D. BROWN pointed an R.G. Industries, Model RG 31, .38 caliber revolver, Serial Number Q214737, at the officers as they entered the

motel room to arrest him. RAMAR D. BROWN told the officers, “I should have shot you when I had the chance,” and “Put my hood back on my head. That’s how I popped all you white [REDACTED].”

25. At all times material to this Indictment, MORRIS L. MITCHELL and RAMAR D. BROWN, were convicted felons.

26. At all times material to this Indictment, the businesses described in Overt Acts 1-24, were engaged in interstate commerce.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(Carjacking)

On or about October 22, 2005, in the Western District of Missouri, MORRIS L. MITCHELL, with the intent to cause death or serious bodily harm, did take a motor vehicle, to wit: a 2000 red Dodge Neon, bearing Missouri License Tag No. XXXX, VIN No. XXXX, which had been transported, shipped and received in interstate commerce, from the person or presence of Paul Czaszewicz, by means of force and violence and by intimidation.

All in violation of Title 18, United States Code, Section 2119.

COUNT THREE
(Hobbs Act Robbery - Shell Gas Station)

1. At all times material to this Indictment, Shell Gas Station, located at 1901 Northeast Russell Road, Kansas City, Clay County, Missouri, was engaged in the wholesale purchase of gasoline, food and beverage, and the retail sale of gasoline, food and beverage, in interstate commerce and was an industry which affects interstate commerce.

2. On November 12, 2005, at Shell Gas Station, located at 1901 Northeast Russell Road, Kansas City, Clay County, Missouri, which is in the Western District of Missouri, defendant

RAMAR D. BROWN, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendant RAMAR D. BROWN, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of the Shell Gas Station, located at 1901 Northeast Russell Road, Kansas City, Clay County, Missouri, and in the presence of Amanda Evinger, an employee of Shell Gas Station, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendant RAMAR D. BROWN threatened her with a knife during the demands for property at the store.

All in violation of Title 18, United States Code, Section 1951.

COUNT FOUR
(Hobbs Act Robbery - Subway)

1. At all times material to this Indictment, Subway, located at 3214 Main Street, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food and beverage and the retail sale of food and beverage, in interstate commerce and an industry which affects interstate commerce.

2. On November 23, 2005, Subway, located at 3214 Main Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants

MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did attempt to steal property consisting of United States currency, from the owners of Subway, located at 3214 Main Street, Kansas City, Jackson County, Missouri, in the presence of Dasia Calhoun, an employee of Subway, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FIVE

(Hobbs Act Robbery - Naughty But Nice)

1. At all times material to this Indictment, Naughty But Nice, located at 8910 East 40 Highway, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of adult videos and adult novelty items and the retail sale of adult videos and adult novelty items, in interstate commerce and was an industry which affects interstate commerce.

2. On November 24, 2005, at Naughty But Nice, located at 8910 East 40 Highway, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendant RAMAR D. BROWN, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Naughty But Nice, located at 8910 East 40 Highway, Kansas City, Jackson County, Missouri, and in the presence of Matthew Lawson, an employee of Naughty But Nice, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his

person, that is, defendant RAMAR D. BROWN, sprayed pepper spray in the face of Matthew Lawson during the demands for property at the store.

All in violation of Title 18, United States Code, Section 1951.

COUNT SIX
(Hobbs Act Robbery - Millenium Super Stop)

1. At all times material to this Indictment, Millenium Super Stop, located at 1603 West 12th Street, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food, beverage and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On October 5, 2005, at Millenium Super Stop, located at 1603 West 12th Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Millenium Super Stop, located at 1603 West 12th Street, Kansas City, Jackson County, Missouri, and in the presence of Dianne Hubbard and Jenny Menjivar, employees of Millenium Super Stop, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, defendants

MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT SEVEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about November 24, 2005, at Millenium Super Stop, located at 1603 West 12th Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Six of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHT

(Hobbs Act Robbery - Berbiglia)

1. At all times material to this Indictment, Berbiglia, located at 3120 Gillham Plaza, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of liquor, tobacco products, food and beverage and the retail sale of liquor, tobacco products, food and beverage, in interstate commerce and was an industry which affects interstate commerce.

2. On December 6, 2005, at Berbiglia, located at 3120 Gillham Plaza, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such

commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Berbiglia, 3120 Gillham Plaza, Kansas City, Jackson County, Missouri, in the presence of Rhonda Traw, an employee of Berbiglia, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT NINE

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 6, 2005, at Berbiglia, 3120 Gillham Plaza, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Eight of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TEN
(Hobbs Act Robbery - Walgreens)

1. At all times material to this Indictment, Walgreens, located at 2501 Linwood Boulevard, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food, beverage and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 7, 2005, at Walgreens, 2501 Linwood Boulevard, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully attempt to steal property consisting of United States currency from the owners of Walgreens, 2501 Linwood Boulevard, Kansas City, Jackson County, Missouri, and in the presence of Mary Camper, an employee of Walgreens, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT ELEVEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 7, 2005, at Walgreens, 2501 Linwood Boulevard, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of attempted robbery of a business engaged in interstate commerce, charged in Count Ten of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWELVE

(Hobbs Act Robbery - Walgreens)

1. At all times material to this Indictment, Walgreens, 4630 Troost Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food, beverage, and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 7, 2005, at Walgreens, 4630 Troost Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States

currency, from the owners of Walgreens, 4630 Troost Avenue, Kansas City, Jackson County, Missouri, in the presence of Crystal Hendricks, an employee of Walgreens, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTEEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 7, 2005, at Walgreens, 4630 Troost Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Twelve of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOURTEEN

(Hobbs Act Robbery - Shell Gas Station)

1. At all times material to this Indictment, Shell Gas Station, 1901 Russell Road, Kansas City, Clay County, Missouri, was engaged in the wholesale purchase of food, beverage and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 8, 2005, at Shell Gas Station, 1901 Russell Road, Kansas City, Clay County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendant RAMAR D. BROWN, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Shell Gas Station, 1901 Russell Road, Kansas City, Clay County, Missouri, and in the presence of Brenda Kienast, an employee of Shell Gas Station, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendant RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Section 1951.

COUNT FIFTEEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 8, 2005, at Shell Gas Station, 1901 Russell Road, Kansas City, Clay County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Fourteen of this Indictment, a felony for which defendant RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SIXTEEN
(Hobbs Act Robbery - Family Dollar)

1. At all times material to this Indictment, Family Dollar, 634 Prospect Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of clothing and household consumer items and the retail sale of clothing and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 9, 2005, at Family Dollar, 634 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Family Dollar, 634 Prospect Avenue, Kansas City, Jackson County, Missouri, in the presence of Diane McClendon and Araceli Rivas, employees of the Family Dollar, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT SEVENTEEN
(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 9, 2005, at Family Dollar, 634 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L.

MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Sixteen of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHTEEN
(Hobbs Act Robbery - Simply Fashions)

1. At all times material to this Indictment, Simply Fashions, 3135 Prospect Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of clothing and household consumer items and the retail sale of clothing and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 10, 2005, at Simply Fashions, 3135 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendant RAMAR D. BROWN, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Simply Fashions, 3135 Prospect Avenue, Kansas City, Jackson County, Missouri, and in the presence of Shelly Taylor, an employee of Simply Fashions, against her will by means of actual and

threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendant RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Section 1951.

COUNT NINETEEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 10, 2005, at Simply Fashions, 3135 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Eighteen of this Indictment, a felony for which defendant RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii).

COUNT TWENTY

(Hobbs Act Robbery - Osco Drug)

1. At all times material to this Indictment, Osco Drug, 3106 Prospect Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food beverage, and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 11, 2005, at Osco Drug, 3106 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that

term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Osco Drug, 3106 Prospect Avenue, Kansas City, Jackson County, Missouri, in the presence of Ricky Johnson and Kieva Higgins, employees of Osco Drug, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWENTY-ONE

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 11, 2005, at Osco Drug, 3106 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Twenty of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWENTY-TWO
(Hobbs Act Robbery - Family Dollar)

1. At all times material to this Indictment, Family Dollar, 3156 Troost Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of clothing and household consumer items and the retail sale of clothing and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 12, 2005, at Family Dollar, 3156 Troost Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendant RAMAR D. BROWN, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Family Dollar, 3156 Troost Avenue, Kansas City, Jackson County, Missouri, and in the presence of Andre Cottoham, an employee of Family Dollar, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, defendant RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Section 1951.

COUNT TWENTY-THREE
(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 12, 2005, at Family Dollar, 3156 Troost Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendant RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Twenty-Two of this Indictment, a

felony for which defendant RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT TWENTY-FOUR
(Carjacking)

On or about December 13, 2005, in the Western District of Missouri, MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, with the intent to cause death or serious physical harm, did take a motor vehicle, to wit: a 2002 blue Chevrolet Monte Carlo, bearing Missouri License Tag No. XXXX, VIN No. XXXX, which had been transported, shipped, and received in interstate commerce, from the person or presence of Mary and Sonya Heard, by means of force and violence and by intimidation.

All in violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWENTY-FIVE
(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at B.P. Gas Station, located at 4632 Paseo Boulevard, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of carjacking, charged in Count Twenty-Four of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWENTY-SIX
(Hobbs Act Robbery - Shell Gas Station)

1. At all times material to this Indictment, Shell Gas Station, 8435 East 63rd Street, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food, beverage and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at Shell Gas Station, 8435 East 63rd Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Shell Gas Station, 8435 East 63rd Street, Kansas City, Jackson County, Missouri, in the presence of Keonna Warren, an employee of Shell Gas Station, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWENTY-SEVEN

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at Shell Gas Station, 8435 East 63rd Street, Kansas City, Clay County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Twenty-Six of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWENTY-EIGHT
(Hobbs Act Robbery - Fast Stop)

1. At all times material to this Indictment, Fast Stop, 7100 Eastwood Trafficway, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food, beverage and household consumer items and the retail sale of food, beverage and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at Fast Stop, 7100 Eastwood Trafficway, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States

currency from the owners of Fast Stop, 7100 Eastwood Trafficway, Kansas City, Jackson County, Missouri, and in the presence of Joyce Thomas, an employee of Fast Stop, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWENTY-NINE

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at the Fast Stop, 7100 Eastwood Trafficway, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Twenty-Eight of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTY

(Hobbs Act Robbery - McDonalds)

1. At all times material to this Indictment, McDonalds, 5220 Bannister Road, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of food and beverage and the retail sale of food and beverage, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at McDonalds, 5220 Bannister Road, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L.

MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of McDonalds, 5220 Bannister Road, Kansas City, Jackson County, Missouri, in the presence of Meshae Johnson, an employee of McDonalds, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, threatened Meshae Johnson by stating that they had a gun during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTY-ONE
(Hobbs Act Robbery - Fashion Cents)

1. At all times material to this Indictment, Fashion Cents, 3120 Prospect Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of clothing and household consumer items and the retail sale of clothing and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at Fashion Cents, 3120 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such

commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Fashion Cents, 3120 Prospect Avenue, Kansas City, Jackson County, Missouri, in the presence of Juanita Qualis, an employee of Fashion Cents, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTY-TWO

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at Fashion Cents, 3120 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Thirty-One of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTY-THREE

(Hobbs Act Robbery - U-Haul)

1. At all times material to this Indictment, U-Haul, 1530 Locust Street, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of motor vehicles, trailers, and

other products used in packaging, shipping and transporting of goods and the retail sale and rental of trailers and other products used in the packaging, shipping and transporting of goods, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at U-Haul, 1530 Locust Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of U-Haul, 1530 Locust Street, Kansas City, Jackson County, Missouri, and in the presence of Richard Clinkingbeard and Jahmel Holden, employees of U-Haul, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTY-FOUR

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at U-Haul, 1530 Locust Street, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Thirty-Three

of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTY-FIVE
(Hobbs Act Robbery - Family Dollar)

1. At all times material to this Indictment, Family Dollar, 7500 Prospect Avenue, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of clothing and household consumer items and the retail sale of clothing and household consumer items, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at Family Dollar, 7500 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency, from the owners of Family Dollar, 7500 Prospect Avenue, Kansas City, Jackson County, Missouri, in the presence of David Kirby, Ashley Holloman, and Medrianne Darthard-Triplett, employees of Family Dollar, against their will by means of actual and threatened force,

violence, and fear of injury, immediate and future, to their persons, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTY-SIX

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at Family Dollar, 7500 Prospect Avenue, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Thirty-Five of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTY-SEVEN

(Hobbs Act Robbery - Enterprise Car Rental)

1. At all times material to this Indictment, Enterprise Car Rental, 600 Grand Boulevard, Kansas City, Jackson County, Missouri, was engaged in the wholesale purchase of motor vehicles and the retail rental of motor vehicles, in interstate commerce and was an industry which affects interstate commerce.

2. On December 13, 2005, at Enterprise Car Rental, 600 Grand Boulevard, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that

term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, aiding and abetting each other, did knowingly, intentionally, and unlawfully take and obtain property consisting of United States currency from the owners of Enterprise Car Rental, 600 Grand Boulevard, Kansas City, Jackson County, Missouri, and in the presence of Mandy Kirsch, an employee of Enterprise Car Rental, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person, that is, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, used and carried a firearm during the demands for property at the store.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTY-EIGHT

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 13, 2005, at Enterprise Car Rental, 600 Grand Boulevard, Kansas City, Jackson County, Missouri, which is in the Western District of Missouri, defendants MORRIS L. MITCHELL and RAMAR D. BROWN, during and in relation to a crime of violence, namely the offense of robbery of a business engaged in interstate commerce, charged in Count Thirty-Seven of this Indictment, a felony for which defendants MORRIS L. MITCHELL and RAMAR D. BROWN may be prosecuted in a court of the United States, all allegations of which are incorporated by reference herein, used, carried and brandished a firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTY-NINE

(Felon-in-Possession of Firearm)

On or about December 13, 2005, in the Western District of Missouri, MORRIS L. MITCHELL, having been convicted of crimes punishable by imprisonment for terms exceeding

one year, and having been convicted of three violent felonies as defined in 18 U.S.C. § 924(e), committed on occasions different from one another, did knowingly possess, in and affecting commerce, a firearm, to wit, an R.G. Industries, Model RG 31, .38 caliber revolver, Serial Number Q214737, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT FORTY
(Felon-in-Possession of Firearm)

On or about December 15, 2005, in the Western District of Missouri, RAMAR D. BROWN, having been convicted of crimes punishable by imprisonment for terms exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, an R.G. Industries, Model RG 31, .38 caliber revolver, Serial Number Q214737, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL.

FOREPERSON OF THE SPECIAL GRAND JURY

Matthew P. Wolesky, #53253
Special Assistant United States Attorney
Western District of Missouri
Organized Crime Strike Force Unit

Dated: _____
Kansas City, Missouri